7. GREEN LAW IN THE DIGITAL AGE: CHALLENGES AND TRANSFORMATIONS OF ENVIRONMENTAL LAW IN DIGITAL SOCIETY

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CLICK FOR THE PLANET: DIGITAL ACCESS TO ENVIRONMENTAL INFORMATION BETWEEN THE AARHUS CONVENTION AND THE ECHR

Abstract: The digital transformation of public life has significantly changed the circumstances for individuals to obtain environmental information. The article discusses the right to access environmental information in the digital space, with a focus on two complementary European legal systems: the Aarhus Convention, as interpreted by its Compliance Committee (ACCC), and the European Convention on Human Rights (ECHR), as developed by the European Court of Human Rights' case law. While the ACCC has explicitly addressed the obligation of states to disseminate environmental information through electronic means, the ECtHR has developed two parallel but unconnected lines of jurisprudence: one concerning the right of access to environmental information under Article 10 ECHR, as illustrated by *Sdružení Jihočeské Matky v. Czech*

Republic (2006) and *Association Burestop 55 and Others v. France* (2021), and another concerning online access to information more broadly. The article argues that the synthesis of these two lines of jurisprudence is necessary, and that the ECHR framework, lacking an explicit textual basis, has developed only a limited and circumstantial protection that stops short of imposing a general duty of proactive digital disclosure. The article concludes by advocating for a common European standard that could bridge the normative gap between Aarhus and Strasbourg in the digital age.

Keywords: *right of access to environmental information, Aarhus Convention, Article 10 ECHR, digital access*

1. INTRODUCTION

The digital transformation of public life has significantly changed the way in which individuals access information held by public authorities. Official gazettes are increasingly published in electronic format, while environmental registers are primarily accessible online, when they are available at all.[1] The literature has introduced the concept of a "third era" of environmental information, wherein digital infrastructure serves as the principal medium for its dissemination (Haklay, 2017). At the same time, the digital divide means that individuals excluded from digital spaces are thereby excluded from access to information itself (Lythreatis, Singh, & El-Kassar, 2022).

This change has also been recognised at the normative level, both within the framework of the European Declaration on Digital Rights and Principles and in the practice of the UN Special Rapporteur on freedom of expression (European Declaration on Digital Rights and Principles, 2022; UN Doc. A/HRC/17/27, 2011).

Access to information is of particular importance in the field of environmental protection. Principle 10 of the Rio Declaration established the three pillars of environmental democracy (Rio Declaration, 1992; Darpö, 2017), while their legally binding elaboration is provided in the Aarhus Convention (Aarhus Convention, 1998), widely regarded as the most far-reaching instrument of environmental democracy adopted under the framework of the United Nations (UNECE, 2014). The Convention

[1] An illustrative example of this is Estonia, where legal acts are officially published only in electronic form.
Kalda v. Estonia, application no. 17429/10, ECHR judgment, January 19, 2016, par. 52.

regulates this right in a twofold manner: as a right to information upon request (Article 4) and as an obligation of the State to actively disseminate information, inter alia through easily accessible electronic databases (Article 5), the passive and active form of the same right (Počuča, Mladenov, & Mirković, 2018; Whittaker, 2021). The Convention's supervisory mechanism, the Aarhus Convention Compliance Committee (ACCC; Koester, 2007; Jendrośka, 2011), has explicitly articulated the obligation to disseminate environmental information electronically, operationalised through the Updated Recommendations on the More Effective Use of Electronic Information Tools (UNECE, 2021).

In contrast, the European Convention on Human Rights (ECHR) does not include an explicit guarantee of access to information held by public authorities. Since Article 10 of the ECHR does not contain the right to "seek" information, the European Court of Human Rights (ECtHR) has therefore developed its protection gradually, in three phases: from outright rejection, through hesitation, to the recognition of a limited right (Pentney, 2024). The starting position was that Article 10 imposes no positive obligation on the State to collect and disseminate environmental information of its own motion (*Guerra and Others v. Italy*, par. 53).[2] In addition, the door was opened slightly by the decision in *Sdružení Jihočeské Matky v. Czech Republic* (Hins & Voorhoof, 2007)[3] and the standards were consolidated by the Grand Chamber in *Magyar Helsinki Bizottság v. Hungary*.[4] Moreover, in *Association Burestop 55 and Others v. France,* a qualitative requirement of accuracy and reliability of information was added,[5] a possible "fourth phase", in which the Court, however, did not refer to the Aarhus Convention in its Article 10 analysis (Pentney, 2024). In parallel, and independently of the environmental context, the ECtHR has developed a case law concerning online access to information, recognising the internet as one of the principal means of exercising the freedom to receive and impart information.[6] As this paper will seek to demonstrate,

[2]*Guerra and Others v. Italy*, application no. 14967/89, ECHR judgment, February 19, 1998, par. 53.
[3]*Sdružení Jihočeské Matky v. Czech Republic*, application no. 19101/03, ECHR decision, July 10, 2006.
[4]*Magyar Helsinki Bizottság v. Hungary* [GC], application no. 18030/11, ECHR judgment, November 8, 2016, par. 157–170.
[5]*Association Burestop 55 and Others v. France*, applications nos. 56176/18 and 5 others, ECHR judgment, July 1, 2021, par. 108.
[6]*Ahmet Yıldırım v. Turkey*, application no. 3111/10, ECHR judgment, December 18, 2012; *Cengiz and Others v. Turkey*, applications nos. 48226/10 and 14027/11, ECHR judgment, December 1, 2015, par. 52; *Kalda v. Estonia*, par. 52.

these two lines of ECtHR case law have so far developed separately (cf. Pedersen, 2018).

The subject of this paper is the right of access to environmental information in the digital space, analysed through the relationship between the Aarhus system, as interpreted by the ACCC, and the ECtHR system. The hypothesis is that the two lines of the ECtHR's jurisprudence have remained disconnected, and that their synthesis is necessary. Furthermore, the ECtHR jurisprudence has developed only a limited, circumstance-dependent protection, which falls short of the general duty of proactive digital dissemination recognised in the Aarhus system.

The first part of the paper analyses the Aarhus standards according to the practice of the ACCC, while the second examines both lines of the ECtHR's case law. The following part identifies the normative gap and considers the possibility of bridging it through a uniform standard of digital access to environmental information.

2. Digital Access to Environmental Information under the Aarhus Convention

The proactive dimension of the right of access to environmental information is elaborated in Article 5 of the Aarhus Convention through a tiered structure of obligations. First, State Parties are required to ensure that public authorities possess and update environmental information relevant to their functions, and that mandatory information flows are established for activities that may significantly affect the environment (Article 5(1)). Secondly, State Parties are bound to make information transparent and "effectively accessible" to the public (Article 5 (2)). Finally, and crucially for the subject of this paper, State Parties are obliged to ensure that environmental information "progressively becomes available in electronic databases which are easily accessible to the public through public telecommunications networks" (Article 5 (3)). The same paragraph also defines the minimum content of digital availability: reports on the state of the environment, texts of legislation, as well as policies, plans and programmes relating to the environment (Aarhus Convention, 1998; UNECE, 2014). This obligation is complemented by Article 5 (9), which provides for the establishment of pollution registers, an obligation which the Kyiv Protocol developed into the only legally binding international instrument on pollutant release and transfer registers, with an explicit requirement that the register be publicly accessible through the internet and free of charge (Protocol on Pollutant Release and Transfer Registers, 2003).

While the right under Article 4 assumes that an individual is aware of what to request, Article 5 includes an obligation specifically designed for a public that is unaware of this, thereby transferring the responsibility for the initial step to the State.

The wording of Article 5 (3) is indicative of the period in which it was drafted: the obligation is "progressive," and the Convention includes, in several places, a caveat concerning the availability of technology. It is precisely for this reason that the elaboration of this provision through the acts of the Meeting of the Parties is of particular significance. As early as its second ordinary session, the Meeting of the Parties adopted the Recommendations on the More Effective Use of Electronic Information Tools to Provide Public Access to Environmental Information (Recommendations on the More Effective Use of Electronic Information Tools, 2005), while at its seventh session it adopted their updated version, which translates the obligations of states into the language of modern digital governance (UNECE, 2021). In the context of pandemic-related restrictions, the Parties, under the Geneva Declaration on Environmental Democracy, further emphasised the importance of proactive dissemination of environmental information and increased use of electronic means of informing the public (Geneva Declaration on Environmental Democracy, 2021). The "progressiveness" of 1998 has therefore evolved within the Aarhus system in such a way that electronic availability is no longer a matter of technical possibility, but a standard of proper implementation of the Convention.

The interpretation of these obligations in specific cases is entrusted to the Compliance Committee, a quasi-judicial body before which members of the public can directly raise the issue of a State party's compliance (Koester, 2007; Jendrośka, 2011), and whose findings have been systematised in an official digest since 2025 (UNECE, 2025). Four principles regarding the digital dimension of access to information stand out from this jurisprudence. First and foremost, electronic publication is not a replacement for an individual response. Even a system that is primarily based on the publication of information to the public on publicly accessible websites does not absolve the authorities of the responsibility to respond to each request individually, even if it is only by directing the applicant to the appropriate webpage.[7] In this way, the Committee precisely delineated Articles 4 and 5: proactive digital availability is the obligation of the state, rather than a

[7]Findings on communication ACCC/C/2009/36 (Spain), ECE/MP.PP/C.1/2010/4/Add.2, adopted June 18, 2010, par. 57.

burden that may be shifted onto the applicant. Secondly, the concept of 'public authorities' is interpreted functionally: entities exercising public functions or providing public services related to the environment under the control of the state are considered public authorities within the meaning of Article 2, paragraph 2 (b) or (c) of the Convention, regardless of their formal status.[8] For the digital environment, where the management of databases and portals is frequently outsourced to separate entities, this interpretation prevents the obligation from being lost in a chain of contractors. Third, access to information must not be conditional upon a deterrent fee: the Convention does not allow charging for access to information per se, any fee for dissemination must be premised on the understanding that environmental information is held in the public interest, and it must not have a deterrent effect on requesters.[9] In the digital context, this means that paywall models for accessing state environmental databases can hardly withstand the scrutiny of the Convention. Fourth, once it is established that the information in question constitutes environmental information, a presumption in favour of its disclosure applies.[10]

It follows from the foregoing that the Aarhus system regulates digital access to environmental information as a general and systemic obligation of the state, which exists independently of any individual dispute, does not depend on the status or motives of the requester, and is subject to oversight in which the public holds a direct procedural initiative. As the following section will demonstrate, these are precisely the points where the ECtHR system, built on a case-by-case basis under Article 10 of the ECHR, differs the most.

3. Digital Access to Environmental Information under the ECHR

In contrast to the Aarhus system, the ECtHR protection of access to environmental information has been developed judicially, through two lines of case law which have evolved in parallel, yet separately. The first line concerns access to environmental information as such. In *Guerra and Others v. Italy*, the ECtHR took the restrictive approach that the freedom to receive information under Article 10 cannot be construed as imposing a

[8]Findings on communication ACCC/C/2009/37 (Belarus), ECE/MP.PP/2011/11/Add.2, adopted September 24, 2010, par. 67.

[9]Findings on communication ACCC/C/2017/147 (Republic of Moldova), ECE/MP.PP/C.1/2021/30, adopted July 25, 2021, par. 87–88.

[10]Findings on communication ACCC/C/2012/69 (Romania), ECE/MP.PP/C.1/2015/10, adopted June 26, 2015, par. 52.

positive obligation on the State to collect and disseminate environmental information of its own motion (par. 53), and protection was therefore afforded to the residents endangered by the emissions indirectly, through Article 8. The decision in *Sdružení Jihočeské Matky* marked a significant change, as the ECtHR acknowledged for the first time that a refusal of access to documentation regarding a nuclear power plant may be considered within the scope of Article 10, still with a significant margin of discretion (Hins & Voorhoof, 2007). Moreover, the Grand Chamber emphasised, in *Magyar Helsinki Bizottság*, the criteria under which Article 10 guarantees a right of access to information held by the State in the following manner: the purpose of the information request, the nature of the information sought, the role of the seeker in imparting it to the public, and whether the information is ready and available (Magyar Helsinki Bizottság v. Hungary [GC], par. 157–170).[11] The culmination of this line is Burestop, in which the ECtHR supplemented the right of environmental associations to information on the storage of nuclear waste with a qualitative requirement: the information provided by the authorities must be sincere, accurate and sufficient (Association Burestop 55 and Others v. France, par. 85 and 108), although no violation of Article 10 was found in the case at hand. However, the ECtHR did not make any reference to the Aarhus Convention or the issue of the mode in which information is to be made accessible in its Article 10 analysis, despite the fact that this judgment was the most advanced in this line (Pentney, 2024). The protection provided by this line is therefore doubly restricted: it is reactive, as it assumes a request and a refusal, and it is conditional, as it is dependent upon the seeker's status and the purpose of the request. In other words, it is structurally equivalent to Article 4 of the Aarhus Convention, rather than Article 5.

The second line of case law has developed independently of the environmental context and concerns online access to information. The ECtHR first designated the internet, in cases concerning the wholesale blocking of platforms, as one of the principal means of exercising the freedom of expression and information (Ahmet Yıldırım v. Turkey; Cengiz and Others v. Turkey, par. 52). Of greater significance for the subject of this paper, however, is a series of judgments concerning prisoners' access to state-run websites. In Kalda, the ECtHR found a violation of Article 10 because a prisoner had been denied access to three websites containing legal information, run by the State itself and by the Council of Europe; the

[11] On the cumulative nature of the criteria, see Mitov and Others v. Bulgaria (dec.), application no. 80857/17, ECHR decision, February 28, 2023, par. 30.

ECtHR emphasised that an increasing amount of information is available only on the internet, as evidenced by the fact that legal acts in Estonia are officially published solely in the electronic edition of the official gazette (Kalda v. Estonia, par. 52). In Jankovskis, a violation was found in circumstances that are almost paradigmatic for the digital dimension of access to information: the Ministry itself had referred the applicant to a website containing information on education, which existed exclusively online, while the prison authorities denied him access to that very website.[12] This case law was confirmed in Ramazan Demir, concerning access to the websites of the ECtHR, the Turkish Constitutional Court and the Official Gazette.[13] In this line, the ECtHR has explicitly noted the growing recognition of the importance of the internet for the enjoyment of human rights, as well as the fact that certain information is available exclusively online (Mladenov & Staparski, 2022). The Strasbourg system has thereby accepted the key premise of the digital age: where the State publishes its information online, and sometimes only online, access to those digital channels falls within the scope of protection of Article 10.

The limits of this line become apparent, however, the moment the ECtHR is asked for more than access to what already exists. In Mitov, journalists complained that they had not been granted internet access to the entire non-anonymised case law of the Bulgarian Supreme Administrative Court, including all scanned case materials. The ECtHR considered their claims entirely abstract, stressed that it was not for it to make abstract pronouncements on how, and how quickly, a national court should publish its decisions on the internet, and rejected the application as incompatible ratione materiae with Article 10 (Mitov and Others v. Bulgaria (dec.), par. 41).[14] Mitov thus precisely delineates the ceiling of the Strasbourg protection: Article 10 may protect access to a specific piece of information, including information that exists only online, but it does not recognise a general duty of proactive digital publication, which is precisely the duty that the Aarhus system explicitly imposes under Article 5 (3).

A comparative view of the two lines reveals a deeper finding that they do not intersect. The ECtHR does not address the electronic accessibility of environmental information in any case, including Burestop, despite the digital line being well established at that time; furthermore, there are no

[12] *Jankovskis v. Lithuania*, application no. 21575/08, ECHR judgment, January 17, 2017.
[13] *Ramazan Demir v. Turkey*, application no. 68550/17, ECHR judgment, February 9, 2021.
[14] *Mitov and Others v. Bulgaria* (dec.), application no. 80857/17, ECHR decision, February 28, 2023, par. 41.

environmental cases within the digital line. The ECtHR therefore possesses all the necessary components for a synthesis: the recognition that environmental information is protected under Article 10, the recognition that the internet is one of the primary channels for accessing information, and the recognition that denying access to state-held information that is exclusively available online is an interference with that right. However, the ECtHR has not yet integrated them into a digital access standard for environmental information. The subsequent section explores the potential structure of such a synthesis and what it would still lack in order to reach the Aarhus standard.

4. The Normative Gap between Aarhus and EctHR

The comparative analysis in the preceding sections allows the normative gap between the two systems to be reduced to three structural differences. The first concerns the legal basis: the Aarhus obligation of digital dissemination of environmental information rests on an explicit norm (Article 5 (3)), whereas the ECtHR protection has been judicially derived from a provision which does not contain the right to "seek" information. The second concerns the nature of the obligation: the Aarhus obligation is general, systemic and proactive, and belongs to everyone without any interest having to be stated (Article 4 (1)(a)), whereas the Strasbourg protection is reactive and conditional, as it depends on the cumulative fulfilment of the Magyar Helsinki criteria, that is, on the status of the seeker and the purpose of the request. The third concerns supervision: compliance with the Aarhus standard may be raised before the ACCC by any member of the public, including in abstract terms, with regard to the state of the system as such, whereas the ECtHR mechanism presupposes an individual application concerning a specific refusal. As Mitov demonstrates, the general question of digital availability is therefore rejected at the threshold as abstract.

The gap is not unbridgeable, however, since the method for narrowing it already exists in the practice of the ECtHR itself. The ECtHR routinely interprets the Convention in the light of the relevant rules of international law and it is precisely in the environmental field that it has built a rich body of case law in this way (Pedersen, 2018). Indeed, the ECtHR has already relied on the Aarhus Convention, in Burestop, within its Article 6 analysis[15]

[15] *Association Burestop 55 and Others v. France*, par. 54.

and in earlier case law under Article 8, but not in its Article 10 analysis. The synthesis of the two lines may then be accomplished in three phases, none of which involves an exception from current doctrine. In the first place, the logic of Kalda and Jankovskis requires that where information is available only online, denial of access to that digital channel should be viewed as an interference with the right under Article 10, particularly as it is information that the ECtHR has already acknowledged as protected by that provision. Secondly, the qualitative requirement established in Burestop, i.e. that information must be sincere, accurate and sufficient, extends naturally to its availability: information which is formally published but practically inaccessible, outdated or unsearchable does not meet the standard which the ECtHR itself has set. Third, in environmental matters, the Magyar Helsinki criteria should be interpreted in the light of the Aarhus principle that the right to environmental information belongs to everyone, no interest having to be stated. The condition relating to the role and purpose of the person seeking information, the main barrier to the broad application of Article 10, would lose much of its weight in this field.

Support for this third step exists, moreover, within the Council of Europe's own treaty framework: the Convention on Access to Official Documents (Tromsø Convention), in force since 1 December 2020, is the first binding international instrument to guarantee to everyone a general right of access to official documents, irrespective of the requester's status or motives, which is precisely the principle that the Aarhus system expresses through the formula of 'everyone, without an interest having to be stated'. Although its reach remains limited for the time being, with seventeen States Parties, interpreting Article 10 in its light would give the synthesis an additional anchor in an instrument originating from the same legal order as the ECHR itself.

The limits of such a synthesis must nevertheless be openly recognised: it may put the ECtHR protection nearer the Aarhus norm, but it cannot make the two equal. However, it cannot create a general obligation of proactive digital publishing, like the one in Article 5 (3), by judicial legislation, without overstepping the boundary that the ECtHR defined for itself in Mitov. Full convergence is therefore still the task of the norm-maker, whether through instruments of the Committee of Ministers of the Council of Europe or through the further development of the Aarhus system, whereas judicial synthesis can and should close that part of the gap which has arisen by the mere failure of the two lines of case law to meet.

CONCLUSION

The paper started from the hypothesis that the two lines of the ECtHR's jurisprudence, the one relating to access to environmental information under Article 10 and the other relating to online access to information, have remained separate, and the analysis has confirmed the hypothesis: the two lines do not intersect in any case, although the ECtHR has all the elements of their synthesis. The contrast with the Aarhus system has further highlighted the magnitude of the repercussions of this discrepancy. While the Aarhus system has codified the obligation of electronic dissemination of environmental information, developed it through the acts of the Meeting of the Parties and operationalised it through the findings of the ACCC, the ECtHR protection is reactive, conditional and circumstance-dependent: it can protect access to information that exists online, but cannot require that information exists online. The proposed synthesis, consisting of the application of the logic of the digital line to environmental information, the extension of the qualitative requirement established in *Burestop* to the availability of information, and the interpretation of the *Magyar Helsinki* criteria in the light of the Aarhus principle of "everyone, without an interest", may substantially narrow that gap, but can't eliminate it. The final step belongs to the norm-maker.

In the digital era, where access to environmental information begins and increasingly also ends with a single click, this step is not a question of legal aesthetics, but an essential requirement for the three pillars of environmental democracy to stay available to the public for whom they are designed.

REFERENCES

1. Convention on Access to Information, Public Participation in Decision-making and Access to Justice in Environmental Matters (Aarhus Convention), 2161 UNTS 447, June 25, 1998.
2. Council of Europe Convention on Access to Official Documents (Tromsø Convention), CETS No. 205, June 18, 2009 (entered into force December 1, 2020).
3. Darpö, J. (2017). Principle 10 and Access to Justice. Downloaded 2026, June 4 from https://papers.ssrn.com/sol3/papers.cfm?abstract_id=2985277.
4. European Declaration on Digital Rights and Principles for the Digital Decade, OJ C 23, 2022.

5. Geneva Declaration on Environmental Democracy. (2021). Adopted at the seventh session of the Meeting of the Parties to the Aarhus Convention, Geneva, October 2021.
6. Haklay, M. (2017). The Three Eras of Environmental Information: The Roles of Experts and the Public. In: Loreto, V., et al. (eds.), *Participatory Sensing, Opinions and Collective Awareness* (pp. 163–179). Cham: Springer. DOI: 10.1007/978-3-319-25658-0_8.
7. Hins, W., & Voorhoof, D. (2007). Access to State-Held Information as a Fundamental Right under the European Convention on Human Rights. *European Constitutional Law Review*, 3(1), pp. 114–126. DOI: 10.1017/S1574019607001149.
8. Jendrośka, J. (2011). Aarhus Convention Compliance Committee: Origins, Status and Activities. *Journal for European Environmental & Planning Law*, 8(4), pp. 301–314. DOI: 10.1163/187601011X604212.
9. Koester, V. (2007). The Convention on Access to Information, Public Participation in Decision-Making and Access to Justice in Environmental Matters (Aarhus Convention). In: Ulfstein, G., Marauhn, T., & Zimmermann, A. (eds.), *Making Treaties Work: Human Rights, Environment and Arms Control* (pp. 179–217). Cambridge: Cambridge University Press. DOI: 10.1017/CBO9780511494345.010.
10. Lythreatis, S., Singh, S. K., & El-Kassar, A.-N. (2022). The Digital Divide: A Review and Future Research Agenda. *Technological Forecasting and Social Change*, 175, 121359. DOI: 10.1016/j.techfore.2021.121359.
11. Mladenov, M., & Staparski, T. (2022). Human rights approach to Internet access with a special emphasis on the case-law of the European Court of Human Rights. *Revija za evropsko pravo*, *24*(1), 23-38.
12. Pedersen, O. W. (2018). The European Court of Human Rights and International Environmental Law. In: Knox, J. H., & Pejan, R. (eds.), *The Human Right to a Healthy Environment* (pp. 86–96). Cambridge: Cambridge University Press.
13. Pentney, K. (2024). The Right of Access to 'Reliable' Information Under Article 10 ECHR: From Meagre Beginnings to New Frontiers. *European Convention on Human Rights Law Review*, 5(2), pp. 230–267. DOI: 10.1163/26663236-bja10093.
14. Počuča, M., Mladenov, M., & Mirković, P. (2018). The Analysis of the Aarhus Convention in the Context of Good Environmental

Governance. *Economics of Agriculture*, 65(4), pp. 1615–1625. DOI: 10.5937/ekoPolj1804615P.

15. Protocol on Pollutant Release and Transfer Registers to the Convention on Access to Information, Public Participation in Decision-making and Access to Justice in Environmental Matters, Kyiv, May 21, 2003.
16. Recommendations on the More Effective Use of Electronic Information Tools to Provide Public Access to Environmental Information. (2005). Adopted at the second meeting of the Parties to the Aarhus Convention, Almaty, May 25–27, 2005.
17. Report of the Special Rapporteur on the Promotion and Protection of the Right to Freedom of Opinion and Expression. UN Doc. A/HRC/17/27, May 16, 2011.
18. Rio Declaration on Environment and Development. UN Doc. A/CONF.151/26, 1992.
19. United Nations Economic Commission for Europe. (2014). *The Aarhus Convention: An Implementation Guide* (2nd ed.). Geneva: United Nations. Downloaded 2026, June 4 from https://unece.org/DAM/env/pp/Publications/Aarhus_Implementation_Guide_interactive_eng.pdf.
20. United Nations Economic Commission for Europe. (2021). *Updated Recommendations on the More Effective Use of Electronic Information Tools*. Downloaded 2026, July 4 from https://unece.org/environment-policy/public-participation/key-guidance-material.
21. United Nations Economic Commission for Europe. (2025). *Digest of Selected Findings and Advice of the Aarhus Convention Compliance Committee*. Downloaded 2026, July 5 from https://unece.org/sites/default/files/2025-11/ACCC_Digest_v18.11.2025_.pdf.
22. Whittaker, S. (2021). *The Right of Access to Environmental Information*. Cambridge: Cambridge University Press. DOI: 10.1017/9781108954914.